



November 28, 2005

SENT BY ECFS

Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW,
Washington DC 20554

Re: DA 05-2945; Compliance Letter on the efforts and status in
Optivon Inc. meeting the FCC's Order for E911

Dear Commissioner Dortch:

Following is an update on the actions taken by Optivon, Inc, to comply
with the FCC VoIP E911 Order.

Background

Optivon is a young company providing VoIP interconnected service in the Commonwealth of Puerto Rico. Optivon serves business customers only at this time. Optivon is not contemplating, at this time, providing VoIP services to single line residential subscribers that are more prone to nomadic use; we will probably offer that service sometime in the future through service providers that outsource to Optivon hosted switch applications and PSTN access.

Optivon has met with the FCC's requirements of previous orders requiring notification to customers of E911 limitations, including sending the required labels to affix to telephone sets. Optivon is equally in compliance at this time with the current dateline established in the Order, as further clarified by the Commission.

During the past five months Optivon has been in discussions with third party providers to try to comply with the FCC E911 Order. After many discussions and delays it became clear that none of the providers were going to be able to provide service in Puerto Rico by November 28, 2005, so Optivon decided to implement its own solution to provide E911 in Puerto Rico, while contracting with one of the third party providers to provide, when they are ready, the full mobility services both in Puerto Rico and in the rest of the USA where Optivon may offer VoIP services either directly or to other service providers. The E911 third party service provider we contracted with has told us that they plan to be able to transmit ANI and Registered Location Information and the full mobility capability in Puerto Rico before the end of the 1st quarter of 2006.¹

911 Solution

Optivon, through its wholly owned CLEC subsidiary Optivon Telecommunications Services, Inc. ("OTSI")² who has made arrangements directly with the local ILEC and PSAP in Puerto Rico to interconnect its switch to the PSAP facilities, will have the E911 dialing capabilities in the Commonwealth of Puerto Rico.

Connectivity to Wireline E911 Network: OTSI ordered redundant 911 trunks from the local ILEC. These redundant 911 trunks are functional and allow Optivon to route 911 calls, through OTSI, directly to the PSAP.

Transmission of ANI and Registered Location Information: Optivon will send ANI information with each call made to the PSAP. OTSI has also ordered a data circuit to allow the transmission of customer location information and changes. This circuit is scheduled to be completed by December 16, 2005. This data connection will allow Optivon customer service agents to provision new customers on-line.

¹ The E911 implementation in Puerto Rico should be relatively easy since Optivon, through OTSI, already has contracted the PSAP interconnection. What is needed is the data transmission from the E911 service provider and Optivon will be providing in Puerto Rico the full mobility service contemplated in the Order.

² Optivon Telecommunications Services, Inc. ("OTSI") has been certified as a local exchange carrier, reseller and inter-exchange carrier by the Puerto Rico Telecommunications Regulatory Board and also holds a 214 Certificate for international resale issued by the Commission. OTSI sells the local access services in Puerto Rico to Optivon, Inc. OTSI is one of only three switch based local exchange carriers operating in Puerto Rico.

Customers will be able to make changes to their information via a secure web portal, or by calling an Optivon customer service agent, which is available 24/7 hours. Optivon has made arrangements with the local PSAP, that until the data circuit is installed on December 16, 2005, the PSAP will receive the information via email.

Coverage: Since there is only one PSAP in Puerto Rico, this arrangement provides service to 100% of Optivon's customers in Puerto Rico.

Obtaining Initial Registered Location Information: Optivon has obtained complete location information for all of its customers in Puerto Rico.

Obtaining Updated Registered Location Information: Optivon customers can change location information via two methods:

1. By calling an Optivon customer service agent to make changes. This option is available 24/7 hours. The changes made by the agent are transmitted to the PSAP database through the data circuit on-line.
2. By going to a secure web site and updating his/her location information.

Technical Solution for Nomadic Customers: Because Optivon's business model does not offer single line residential customers at this time, the existence of a nomadic customer is very low. In any event, a customer, that can change the location of his phone to another location in Puerto Rico, will have the two options described above to make changes on-line. Optivon continues to talk with its vendors and third party providers in search of an automatic detection mechanism, which will detect that a customer has moved his service, and prompt him for new location information.

If you have any question you can contact me at 787-625-2720 or send me an email at rmorales@optivon.com

Regards,

Rafael Morales

Rafael Morales
Vice President

xc. Luis G. Romero Font, President